

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

PROGRESSIVE SPECIALTY)
INSURANCE COMPANY,)
)
Plaintiff,)
)
v.) CIVIL ACTION NO: 2:06-CV-336-MHT
)
DARRYL D. FINCH, et al.,)
)
Defendants.)

MOTION FOR DEFAULT JUDGMENT

Comes now the plaintiff, Progressive Specialty Insurance Company (“Progressive”), pursuant to Rule 55 of the Federal Rules of Civil Procedure, and moves the court to enter a default judgment against the defendant, Bernard Washington, based upon the following facts:

1. Bernard Washington was duly served with a copy of the summons and complaint on April 26, 2006, by certified mail.
2. Bernard Washington has not filed an answer or otherwise defended the complaint. He is not an infant or an incompetent.
3. Progressive requests the court to enter a default judgment against Bernard Washington holding that he is not entitled to any insurance proceeds under the Progressive policy issued to Darryl D. Finch Enterprises, Inc.

/s/ R. Larry Bradford

R. Larry Bradford, Attorney for Plaintiff,
Progressive Specialty Insurance Company
Attorney Bar Code: BRA039

OF COUNSEL:

Bradford & Sears, P.C.
2020 Canyon Road
Suite 100
Birmingham, AL 35216
(205) 871-7733

CERTIFICATE OF SERVICE

I hereby certify that I have this the 11th day of July, 2006, served a copy of the foregoing to all attorneys of record by placing a copy of same in the United States Mail, postage prepaid and properly addressed as follows:

Mr. Darryl D. Finch
3347 Wells Road
Montgomery, Alabama 36108

Darryl D. Finch Enterprises, Inc
P.O. Box 240224
Montgomery, Alabama 36124

Mr. Bernard Washington
4782 Burnsdale Way
Montgomery, Alabama 36108-5165

/s/ R Larry Bradford
OF COUNSEL